

# Privacy Policy



*Tharsis Ship Management and her subsidiary Tharsis Sea-River Shipping value the protection of your personal data. In this Privacy Policy we seek to give clear and transparent information on how we handle personal data.*

*We make every effort to ensure your privacy and therefore handle personal data with care. Tharsis Ship Management and its subsidiary Tharsis Sea-River Shipping comply in all cases with applicable laws and regulations, including the General Data Protection Regulation. This implies that:*

- We handle your personal data in accordance with the purpose for which they were provided, these purposes and type of personal data are described in this Privacy Policy;*
- Processing of your personal data is limited to those data that are minimally required for the purposes for which they are processed;*
- We will ask for your explicit consent if our company needs it for processing your personal data;*
- We have taken appropriate technical and organizational measures to ensure the security of your personal data;*
- We do not pass on personal data to other parties, unless this is necessary for carrying out the purposes for which they were provided;*
- We are aware of your rights regarding your personal data, to emphasize these, and to respect them.*

*Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.*

*As Tharsis Ship Management we are responsible for the processing of your personal data. If, after reading our Privacy Policy, or in a more general sense, you have questions about this or want to contact us, you can do this via the following contact details:*

*Tharsis Ship Management\**

*P.o.Box 299*

*9930 AG Delfzijl*

*Tel. +31 617 157815*

*E-mail [Contact@tharsis-management.nl](mailto:Contact@tharsis-management.nl)*

*\*Tharsis Ship Management is managing owner of Tharsis Sea-River Shipping.*

*Tharsis Ship Management is a registered trademark of Banier Scheepvaart B.V. and Tharsis Sea-River Shipping is a registered trademark of Scheepvaartonderneming Tharsis C.V.*

## Processing of personal data of Customers or suppliers

Personal data of customers or suppliers are processed by Tharsis Ship Management and Tharsis Sea-River Shipping for the following purpose (s):

- Administrative purpose;
- Communication about the assignment and / or invitations;
- Implementing or issuing an assignment.

The basis for this personal information is:

- The agreed assignment;

For the purpose (s) above, Tharsis Ship Management and Tharsis Sea-River Shipping may request the following personal information from you:

- First Name;
- Insertion;
- Last name;
- (Business) Phone number;
- (Business) email address;
- Gender.

Your personal data will be stored by Tharsis Ship Management or Tharsis Sea-River Shipping for the above mentioned processing (s) for the period:

- During the term of the agreement and thereafter only in the financial administration for a maximum of 7 years.

## Processing personal details of prospect, stakeholder / lobby contacts and / or interested party

Personal details of prospect, stakeholder / lobby contacts and / or interested parties are processed by Tharsis Ship Management and Tharsis Sea-River Shipping for the following objective(s):

- Provision of information in the form of newsletters and / or targeted contacts.

The basis for this personal information is:

- Oral permission, issuing a business card and / or via link on LinkedIn;

For the purpose (s) above, Tharsis Ship Management or Tharsis Sea-River Shipping may request the following personal information from you:

- First Name;
- Insertion;
- Last name;
- Phone number;
- E-mail address.

Your personal data will be stored by Tharsis Ship Management or Tharsis Sea-River Shipping for the above mentioned processing (s) for the period:

- During the period that you are seen as a prospect, stakeholder / lobby contacts and / or interested party.

## Processing of personal data of Employees

Personal Data of Employees are processed by Tharsis Ship Management and Tharsis Sea-River Shipping for the following objective(s):

- Implementation of the employment contract, complying with the Maritime Labour Convention (MLC)2006 and with the

The basis for this personal information is:

- The employment contract.

For the purpose (s) above, Tharsis Ship Management and Tharsis Sea-River Shipping may request the following personal information from you:

- First Name;
- Insertion;
- Last name;
- Gender;
- Next of kin;
- Phone number;
- E-mail address;
- Date of birth;
- Salary data;
- Copy ID;
- BSN number;
- Bank details.
- Educational information, Medical and STCW certificates and CV.

Your personal data will be stored by Tharsis Ship Management and Tharsis Sea-River Shipping for the above mentioned processing (s) for the period:

- During the period that you have a contract and if there is an agreement for the employee to return for another contract, also for the period in between these contracts. After termination of the last contract personal data will only be stored in the financial administration for a maximum of 7 years.

## Processing of personal data of Ship's Passengers

Personal Data of Ship's Passengers are processed by Tharsis Ship Management and Tharsis Sea-River Shipping for the following objective(s):

- Sailing as a passenger on a ship managed by Tharsis Ship Management

The basis for this personal information is:

- Digital permission prior to embarking

For the purpose (s) above, Tharsis Ship Management and Tharsis Sea-River Shipping may request the following personal information from you:

- First Name;
- Insertion;
- Last name;
- Gender;
- Phone number;
- E-mail address;
- Date of birth;
- Name and Phone number of parents, legal representatives or care takers in case of a minor
- Copy ID;
- Bank details;
- Medicine use, if any;
- Car license plate.

Your personal data will be stored by Tharsis Ship Management and Tharsis Sea-River Shipping for the above mentioned processing for the period:

- During the period of sailing up to 6 months after disembarking. Name and town of residence will be stored for a maximum of 7 years.

## Provision to third parties

We may provide the information you give to us to third parties if this is necessary for the execution of the above described purposes.

For example, we use a third party for:

- Providing the internet environment of the AVG program;
- Taking care of the (financial) administration;
- Insurance handling;
- Taking care of crewing and manning;
- Acting as a legal representative for the ship owner for a ship's call to any port.

We never pass on personal data to other parties with whom we have not entered into a processor agreement. With these parties (processors), we of course make the necessary arrangements to ensure the security of your personal data. Furthermore, we will not pass on the information provided by you to other parties, unless this is legally required and permitted. An example of this is that the border police request us (personal) data in the context of an investigation. In such a case we must cooperate and are therefore obliged to provide this information. We may also share personal data with third parties if you give us permission in writing.

## Within the EU

We do not provide personal data to parties which are located outside the EU.

## Minors

We only process personal data of minors (persons under the age of 18) if written permission has been given by the parent, caregiver or legal representative.

## Storage period

Tharsis Ship Management and Tharsis Sea-River Shipping do not retain personal data for longer than necessary for the purpose for which they were provided or required by law.

## Security

We have taken appropriate technical and organizational measures to protect your personal data against unlawful processing, for example we have taken the following measures;

- All persons who are able to access your data on behalf of Tharsis Ship Management and Tharsis Sea-River Shipping are obliged to maintain their confidentiality.
- We use a username and password policy on all our systems; - We pseudonymise and ensure the encryption of personal data if there is reason to do so;
- We make back-ups of the personal data in order to be able to recover these in case of physical or technical incidents;
- We regularly test and evaluate our measures; - Our employees have been informed about the importance of the protection of personal data.

## Rights concerning your data

You have the right to inspect, rectify or delete the personal data we have received from you. You can also object to the processing of your personal data (or a part thereof) by us or by one of our processors. You also have the right to have the data provided by you transferred by us to yourself or by order of you directly to another party. We can ask you to identify yourself before we can comply with the aforementioned requests.

May we process your personal data on the basis of a permission given by you, you will always have the right to withdraw this consent.

## Complaints

If you have a complaint about the processing of your personal data, we ask you to contact us directly. If we do not come together with you then we find this very annoying. You always have the right to file a complaint with the Dutch Data Protection Authority, this is the supervisory authority in the field of privacy protection.

## Questions

If you have any questions or comments about our Privacy Statement please contact us!

## Contact details

*Tharsis Ship Management\**

*P.o.Box 299*

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